

Defendants.

NOTICE OF REMOVAL

2. This action is one in which the United States District Courts have original jurisdiction, because the action involves a controversy which is wholly between citizens and/or entities of different states, in that upon information and belief, the Plaintiffs were at the time of the commencement of this action, and still are, citizens of the State of South Carolina. The

Defendants were at the time incorporated with its principal place of business in a State other than South Carolina or reside in a State other than South Carolina.

3. The Defendant is entitled to removal of the aforesaid action to this Court because complete diversity of citizenship exists between the Plaintiffs and the Defendants and the amount in the controversy exceeds the jurisdictional amount required by 28 U.S.C. § 1332.

4. This action was commenced by service of the Summons and Complaint, attached hereto as Exhibit A, effectuated by Certified Mail on December 14, 2020. Pursuant to 28 U.S.C. § 1446, this Notice of Removal is filed within thirty (30) days of service upon the Defendant of the initial pleadings setting forth the claim upon which relief is requested. This Defendant will serve an Answer or responsive pleading as provided by law.

5. The The Honorable Margaret Bostick, Clerk of Court of Jasper County, has been provided a copy of this Notice of Removal.

WHEREFORE, this Defendant gives notice that the aforesaid action is removed from the Circuit Court of Jasper County, State of South Carolina, and to this Court for trial and determination.

MCANGUS GOUDELOCK & COURIE, L.L.C.

s/R. Trippett Boineau, III

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Columbia, South Carolina
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